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February 23, 2006

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**RE: Standardized and Enhanced Disclosure Requirements for Television
Broadcast License Public Interest Obligations, MM Docket No. 00-168; and
Public Interest Obligations of TV Broadcast Licensees, MM Docket No. 99-360**

Dear Ms. Dortch:

Pursuant to section 1.1206(b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceedings.

On Wednesday, February 22, 2006, representatives of the Public Interest, Public Airwaves (PIPA) Coalition met with Commissioner Deborah Taylor Tate and Andrew Long. The Coalition urged the Commission to act promptly to issue a report and order adopting meaningful disclosure requirements in Docket 00-168, as well as to issue a Notice of Proposed Rulemaking following the Notice of Inquiry in Public Interest Obligations of TV Licensees, MM Docket No. 99-360. The Coalition also informed Commissioner Tate that these proceedings have been pending for years, and that the FCC sought public input on the matter as early as 1995. *See Advanced Television Systems and Their Impact Upon The Existing Television Broadcast Service*, 10 FCC Rcd 10,540 (1995).

PIPA members noted that the airwaves are a public asset allocated to broadcasters by the FCC. Defining the public interest obligations of broadcasters goes to the heart of the regulatory system, because it ensures that Americans receive the full value for the allocation of their public airwaves.

Coalition members noted that the current issues and programs listed in broadcasters' public files provide an ineffective means for the public or the Commission to assess a

licensee's performance. Because current disclosure requirements are vague, information in broadcasters' public files lacks consistency and detail. Thus, it is difficult for either the FCC or the public to determine the amount and type of programming a broadcaster carries. Members stressed the importance of adopting a standardized disclosure form in which licensees would provide information about their public interest programming. The Coalition provided a copy of previously filed proposed draft disclosure form, dated June 18, 2004, guidelines for public interest obligations, dated April 7, 2004, and memoranda addressing their constitutionality. All of these documents have been previously filed with the Commission. *See, e.g.,* Letter from James A. Bachtell to Marlene Dortch, MM Docket Nos. 03-15, 00-168, 99-360 (June 24, 2004). Further, the Coalition presented the recent Consumer Advocacy Commission recommendations, the February 16, 2006 letter to Chairman Martin from Charles Benton, Chairman and CEO of the Benton Foundation, and the January 18, 2006 letter to Chairman Martin from the Benton Foundation, Campaign Legal Center, Common Cause, New America Foundation, and Office of Communication of the United Church of Christ, Inc. These two letters were previously filed with the Commission. *See* Letter from Charles Benton to Chairman Martin, MM Docket No. 99-360 (Feb. 16, 2006), and Letter from Campaign Legal Center to Chairman Martin, MM Docket No. 00168 (Jan. 20, 2006). Finally, members also presented a copy of the Benton Foundation publication "*Citizen's Guide to the Public Interest Obligation of Digital Television Broadcasters*" previously filed with the Commission. *See* Letter from Charles Benton to Chairman Martin, MM Docket No. 99-360 (Feb. 16, 2006).

PIPA Coalition members in attendance were: Gloria Tristani of the Office of Communication of the United Church of Christ, Inc.; Meredith McGehee of the Campaign Legal Center; Katharine Grincewich of the United States Conference of Catholic Bishops; Karen Menichelli of the Benton Foundation; Andrew Schwartzman of Media Access Project; Lindsey Michaelson of Common Cause; and Marvin Ammori and Lynn Rosenstock of the Institute for Public Representation.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. If you have any questions regarding this filing, please do not hesitate to contact me at (202) 662-9535.

Respectfully Submitted,

/s/

Marvin Ammori